

Daniel J. Flanigan (NY #4266250)
James E. Bird (MO #28833)
Polsinelli Shalton Flanigan Suelthaus PC
7 Penn Plaza, Suite 600
New York, New York 10001
(212) 684-0199
Fax: (212) 684-0197
dflanigan@polsinelli.com
jbird@polsinelli.com

Christopher A. Ward (DE #3877)
222 Delaware Avenue, Suite 1101
Wilmington, Delaware 19801
(302) 252-0922
Fax No. (302) 252-0921
cward@polsinelli.com

Attorneys for BATS Holdings, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

**LEHMAN BROTHERS HOLDINGS,
INC., et al.,**

Case No.: 08-13555 (JMP)

Debtors.

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NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that the undersigned counsel hereby enter their appearance on behalf of BATS Holdings, Inc., and request that all notices given and all papers served in the above-captioned case be given and served upon:

James E. Bird
Polsinelli Shalton Flanigan Suelthaus PC
700 W. 47th Street, Suite 1000
Kansas City, Missouri 64112
jbird@polsinelli.com

Christopher A. Ward
Polsinelli Shalton Flanigan Suelthaus PC
222 Delaware Avenue, Suite 1101
Wilmington, Delaware 19801
cward@polsinelli.com

The foregoing request includes, without limitation, the notices and papers referred to in Bankruptcy Rules 2002 and 9007, the disclosure statement referred to in Bankruptcy Rule 3017, and also includes, without limitation, notice of any orders, applications, demands, complaints, hearings, motions, objections, petitions, pleadings, requests, plans and any other documents brought before the Court in this case, whether or formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telecopier, e-mail, or otherwise.

This Notice of Appearance and Request for Notices shall not be deemed or construed to be a waiver of any right to (i) have final orders in non-core matters entered only after *de novo* review; (ii) trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation vel non of such matters as “core proceedings” pursuant to 28 U.S.C. 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution; (iii) have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) assert any other rights, claims, actions, setoffs, or recoupments to which such party is or may be entitled, all of which are expressly reserved.

Respectfully Submitted,

POLSINELLI SHALTON FLANIGAN SUELTHAUS PC

By: /s/ Daniel J. Flanigan

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